

REPLY TO FINAL OFFICE ACTION DATED MAY 2, 2005

SERIAL NO: 09/834,325  
DOCKET NO: 199-0044US**REMARKS**

Claims 1-15, and 24-33 are pending.

Claim 26 is amended to correct a formality error.

Claims 1-15, and 24-33 are still pending.

**Claim Objection**

Claim 26 was objected for informality. Applicants appreciate Examiner's patience and explanation of the error in claim 26. The error is now corrected. Applicants respectfully request the withdrawal of the objection.

**Rejections under 35 U.S.C. § 103****Claims 1-3, 5-11, 15, 24-25**

The Examiner rejected claims 1-3, 5-11, 15 and 24-25 under § 103(a) as obvious over U.S. Patent 5,617,539 to Ludwig ("Ludwig"), U.S. Patent 5,768,163 to Smith II ("Smith") and U.S. Patent 5,844,599 to Hildin ("Hildin"). Claims 1 and 24 are independent claims; other claims depend, either directly or indirectly, from one of these two claims. Because independent claims 1 and 24 are allowable over the cited art, it is not necessary to address the rejections of the dependent claims. Therefore, the following remarks focus on independent claims 1 and 24.

In response to Applicants' argument filed on 11/23/2004, regarding the three references: Ludwig, Smith and Hildin, Examiner reasserted that there was teaching or suggestion for their combination. Applicants disagree.

Specifically, aside from the argument presented on 11/23/2004, Applicants would like to draw Examiner's attention to the teaching of Smith. Examiner asserted that "Smith teaches a portable computer including a camera adapter to receive a camera unit in order to expand the versatility of the portable computer (col. 3 line 31 through col. 4 line 32)." Applicants submit that this characterization of the teaching of Smith is not entirely correct. Smith does teach a camera adapter, or more precisely a "*versatile attachment* of a handheld device" to a host computer system, but the "*versatile attachment*" is not part of the host computer system (e.g. a laptop computer, which Examiner asserted to be equivalent to the main unit of claim 1).

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The "versatile attachment" of Smith can be attached to the host or *detached*. It is not considered a part of the host computer (e.g. laptop computer). For example, Col. 1, lines 57-58 "... by placing a hinged connector on an *outside* of a case of the host computer." To make the "versatile attachment" versatile and expand the versatility of a portable computer, the "versatile attachment" is attachable and *detachable* from the host. For example, Col. 3, lines 32-33: "Media clip pad 11 can be attached to *or detached* from portable computer 10 and/or a desktop computer 14." If the "versatile attachment" were made un-detachable part of the host laptop computer (i.e. becoming a part of the host computer), then much of the versatility is lost. See MPEP 2143.01 "the proposed modification cannot change the principle of operation of a reference." From the general teaching of Smith, and the cited sentences above in particular, Smith teaches that the versatile attachment is not and should not be part of the host computer. Smith teaches away from making a camera adapter (versatile attachment) be a part of the main unit (laptop computer), which is required by the invention of claim 1, "... the main unit including ... a camera adapter, ... ." See MPEP 2141.02 "prior art must be considered in its entirety, including disclosures that teach away from the claims." Therefore, Smith cannot be properly combined with Ludwig.

Furthermore, Smith teaches that the handheld device can be a digital camera, e.g. Figure 7, 8 and 17, Col. 4 line 50 – Col. 5, line 11. These teaching show that the handheld camera is a simple camera to take snap shot or video clips. There is no teaching or suggestion that such a handheld device is capable to "generate control signals to control at least one of the direction or zoom of the camera unit."

Hilden disclosed a sophisticated "voice following video system," which includes a position control system 106 (Fig. 1) and voice-activated emitter 104, and may be able to "generate control signals to control at least one of the direction or zoom of the camera unit," but there is no teaching or suggestion that such a system can be implemented into a handheld digital camera by modifying the teaching in Smith. Even if "one skill in the art would recognizes to modify the laptop computer with the features as taught by Smith and Hildin in order to expand the versatility of the portable computer and to make user friendly," which Applicants do not concede, there is no teaching or suggestion that such a modification of Smith (a handheld digital camera) by Hilden (voice following video system) can have a "reasonable expectation of success." Aside from a bare assertion, Examiner cited no support from any references. See

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MPEP 2143. Therefore, Smith cannot be properly combined with Hilden.

For the above reasons, the combination of Ludwig and Smith, and the combination of Smith and Hilden are not proper. Therefore, the combination of Ludwig, Smith and Hilden is not proper and the rejection based on their combination is improper. Claim 1 is allowable and its allowance is requested.

Independent claim 24 has at least the same limitations regarding the "main unit," so it is allowable for the same reasons. All other dependent claims 2-15 and 25 depend directly or indirectly from independent claims 1 and 24, therefore they are all allowable and their allowance is requested.

#### Claims 4 and 12-14

Claims 4 and 12-14 were rejected further in view of Robinson. Since they are dependent claims from claim 1, they are allowable at least for the reason given above.

#### Claims 26-33

Independent claim 26 was rejected in view of the combination of Ludwig and Smith. For the reason discussed above, the combination of Ludwig and Smith is improper. So the rejection is improper. Claim 26 is allowable and its allowance is requested. Dependent claims 27-33 depend from claim 26 directly or indirectly, so they are all allowable and their allowance is requested.

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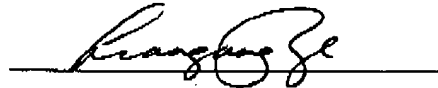
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Reconsideration of the pending claims in light of the above remarks and allowance of all pending claims are respectfully requested. If, after considering this reply, the Examiner believes that a telephone conference would be beneficial towards advancing this case to allowance, the Examiner is invited to contact the undersigned attorney at the number listed.

8/2/2005

Date



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